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REGULATORY AUTH.

APR 22 1999 PM 4 13

OFFICE OF THE
EXECUTIVE SECRETARY
VIA HAND DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: *Petition of BTI Telecommunications, Inc. for Waiver
of an InterLATA Toll Dialing Parity Implementation Plan*
TRA Docket No. 99-00299

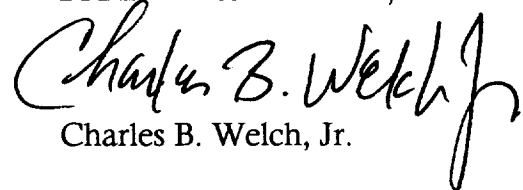
Dear Mr. Waddell:

Enclosed for filing, please find the original plus thirteen (13) copies of the Petition for Waiver of an IntraLATA Toll Dialing Parity Implementation Plan filed on behalf BTI Telecommunications, Inc., along with the requisite filing fee. Copies are being served on parties of record.

If you have any questions or concerns with regard to this filing, please do not hesitate to contact me.

Very truly yours,

FARRIS, MATHEWS,
BRANAN & HELLEN, P.L.C.


Charles B. Welch, Jr.

CBWjr:cg

cc: Jean Houck
Joe Werner, Telecommunications Chief
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BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE:

PETITION OF BTI TELECOMMUNICATIONS,
INC. FOR WAIVER OF AN INTERLATA TOLL
DIALING PARITY IMPLEMENTATION PLAN

DOCKET NO.

99-00299

PETITION

BTI Telecommunications, INC. ("BTI") petitions the Tennessee Regulatory Authority ("TRA") pursuant to 47 U.S.C. 251(f)(2) for a waiver of filing an IntraLATA Toll Dialing Parity Implementation Plan in compliance with 47 U.S.C. 251(b)(3) and 47 U.S.C. 252(c) pursuant to Notice issued on April 5, 1999, and in support of its Petition states as follows:

1. BTI is a local exchange carrier with fewer than 2 percent of the nation's subscriber lines installed in the aggregate nation-wide.
2. BTI is authorized to provide telecommunications services within the State of Tennessee pursuant to Order of the TRA issued on October 7, 1998 in Docket No. 98-00334.
3. BTI is not currently providing telecommunications services to any customers within the State.
4. BTI submits that it is technically infeasible and unduly economically burdensome for it to prepare an IntraLATA Toll Dialing Parity Implementation Plan prior to the development of its business plan and before it acquires customers in Tennessee. Preparation of such a plan at this time would be of no value and would necessarily require significant revision resulting in an unnecessary duplicative expenditure of resources.
5. BTI contends that it is consistent with the public interest, convenience and

necessity for the TRA to suspend the requirement of filing an IntraLATA Toll Dialing Parity Implementation Plan as to BTI until such time as it offers and provides telecommunications services to customers within the State of Tennessee.

WHEREFORE, premises considered, BTI requests that:

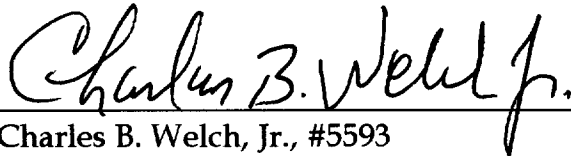
1. the TRA act upon this Petition within one hundred eighty (180) days after April 22, 1999;
2. pending such action, the TRA suspend enforcement of the requirement to file or implement an IntraLATA Toll Dialing Parity Plan; and
3. the TRA grant such other specific and general relief as may be appropriate at the hearing of this cause.

DATED this the 22nd day of April, 1999.

Respectfully submitted,

FARRIS, MATHEWS,
BRANAN & HELLEN, P.L.C.

BY:



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